

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

Texas League of United Latin American Citizens, et al., <i>Plaintiffs,</i>	§ Civil Action No.: 5:19-CV-00074-FB [Lead Case]
v.	§
David Whitley; et al. <i>Defendants</i>	§
MOVE Texas Civic Fund, et al. <i>Plaintiffs,</i>	§ Civil Action No. 5:19-CV-00171-FB [Consolidated Case]
v.	§
David Whitley, et al. <i>Defendants</i>	§
Julieta Garibay, et al. <i>Plaintiffs,</i>	§ Civil Action No. 5:19-CV-00159-FB [Consolidated Case]
v.	§
David Whitley, et al. <i>Defendants</i>	§

**NOTICE OF FILING OF SUPPLEMENTAL EXHIBITS IN SUPPORT OF MOVE  
TEXAS CIVIC FUND ET AL.'S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs MOVE Texas Civic Fund, Jolt Initiative, League of Women Voters Texas, and Nivien Salah (hereinafter “MOVE Plaintiffs”) hereby file the Declaration of Ann Harris Bennett, the Declaration of Dr. Lorraine C. Minnite, and the Declaration of Alexandra Moldovan in support of their Motion for Preliminary Injunction. The Court entered these exhibits into the record at the February 25, 2019 hearing, at which point Counsel for MOVE stated that they would be filed officially on the Court’s docket.

Respectfully submitted,

Mimi Marziani  
Texas Bar No. 24091906  
Rebecca Harrison Stevens  
Texas Bar No. 24065381  
Joaquin Gonzalez\*  
Texas Bar No. 24109935  
Texas Civil Rights Project  
1405 Montopolis Drive  
Austin, TX 78741-3438  
Telephone: (512) 474-5073  
beth@texascivilrightsproject.org

Jon Greenbaum\*  
D.C. Bar No. 489887  
Ezra D. Rosenberg\*  
D.C. Bar No. 360927  
Brendan B. Downes\*  
D.C. Bar No. 187888  
Jennifer Nwachukwu\*  
Maryland Bar No. 1706200131  
Lawyers' Committee for Civil Rights Under  
Law  
1500 K Street NW, Suite 900  
Washington, D.C. 20005  
Telephone: (202) 662-8600  
Fax: (202) 783-0857

Sophia Lin Lakin\*  
New York Bar No. 5182076  
Dale E. Ho\*\*  
New York Bar No. 4445326  
American Civil Liberties Union  
125 Broad Street, 18th Floor  
New York, NY 10004  
Telephone: (212) 519-7836  
Fax: (212) 549-2654

/s/ Thomas Buser-Clancy  
Thomas Buser-Clancy  
Texas Bar No. 24078344  
Andre Segura\*  
Texas Bar No. 24107112  
Edgar Saldivar  
Texas Bar No. 24038188  
Brian Klosterboer\*  
Texas Bar No. 24107833  
American Civil Liberties Union  
Foundation of Texas  
P.O. Box 8306  
Houston, TX 77288  
Telephone: (713) 325-7011  
Fax: (713) 942-8966  
asegura@aclutx.org

Chiraag Bains\*\* †  
Massachusetts Bar No. 673627  
Dēmos  
740 6th Street NW, 2nd Floor  
Washington, DC 20001  
Telephone: (202) 864-2746

Stuart C. Naifeh\*  
California Bar No. 233295  
Brenda Wright\*  
New York Bar No. 1863240  
Dēmos  
80 Broad Street, 4th Floor  
New York, NY 10004  
Telephone: (212) 485-6055  
Fax: (212) 633-2015

#### ATTORNEYS FOR PLAINTIFFS

\* Motion to Appear Pro Hac Vice pending before the Court

\*\* Motion to Appear Pro Hac Vice forthcoming

† Admitted in Massachusetts, not D.C.; practice consistent with D.C. App. R. 49(c)(3).

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing document was served upon defense counsel via this Court's ECF system.

/s/Thomas Buser-Clancy  
Thomas Buser-Clancy